

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Kobalt Music Publishing America, Inc.
Coordinated Copyright cases

This document relates to:
All Coordinated Cases

24-cv-05454 (ER) (BCM)
24-cv-05455 (JAV) (BCM)
24-cv-05456 (AKH) (BCM)
24-cv-05457 (JGK) (BCM)
24-cv-05458 (VM) (BCM)
24-cv-05459 (JAV) (BCM)
24-cv-05460 (LJL) (BCM)
24-cv-05462 (GHW) (BCM)
24-cv-05463 (JLR) (BCM)
24-cv-05464 (JGK) (BCM)
24-cv-05465 (GHW)(BCM)
24-cv-05466 (JHR) (BCM)

DECLARATION OF CHRISTOPHER WOODS

Pursuant to 28 U.S.C. § 1746, I, CHRISTOPHER WOODS, declare and state as follows:

1. I am the Chief Operating Officer for TuneSat, LLC (“TuneSat”). I have personal knowledge of all the facts stated below. I have been an officer at TuneSat for more than 15 years. I have extensive knowledge about TuneSat’s business, systems, and operations.

2. TuneSat is an independent audio monitoring service. Using proprietary audio recognition technology, TuneSat locates “detections” or “uses” of its clients’ music, together with related technical data, across an array of internet and broadcast-based content.

3. Broadly speaking, TuneSat’s technology works by cataloging and archiving audio-visual content across internet sources. TuneSat then uses its

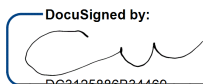
proprietary “acoustic fingerprint” technology to identify uses of a client’s music in audio-visual content it has archived. Acoustic fingerprinting works by analyzing waveforms and extracting the unique characteristics of an audio file. The resulting output—an acoustic fingerprint—is a condensed representation of an audio signal that captures its signature and allows it to be differentiated from other sounds.

4. TuneSat analyzes massive amounts of data for clients in a dynamic environment where the ownership for works is often in flux. Over the course of more than 15 years, TuneSat has continuously refined its operations to maximize its monitoring effectiveness for its clients. The way it communicates with clients, the types of data it uses, its internal processes, and the types of data it generates are all critical to the company’s business success. The redactions proposed in Exhibit A are all related to these areas.

5. The space in which TuneSat operates is highly competitive and occupied by a limited number of participants. Thus, even high-level knowledge of aspects of TuneSat’s operations could put the company at a competitive disadvantage.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 10, 2025

DocuSigned by:

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Christopher Woods